

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) for Authority to Implement Optional Pilot Program to Increase Customer Access to Solar Generated Electricity.

Application 12-01-008
(Filed January 17, 2012)

And Related Matters.

Application 12-04-020
Application 14-01-007

**DECISION AWARDING INTERVENOR COMPENSATION TO
SUSTAINABLE ECONOMIES LAW CENTER
FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-01-051**

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| Intervenor: Sustainable Economies Law Center (SELC) | For contribution to Decision (D.) 15-01-051 |
| Claimed: \$ 24,626.65 | Awarded: \$24,626.65 |
| Assigned Commissioner: Michael Picker | Assigned ALJ: Regina M. DeAngelis |

PART I: PROCEDURAL ISSUES

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| A. Brief description of Decision: | D.15-01-051 begins implementation of Senate Bill (SB) 43 (Stats. 2013, ch 413 (Wolk)), which requires that the three large electrical utilities implement the Green Tariff Shared Renewables (GTSR) Program. D.15-01-051 addresses Phase I, II, and III of the proceeding and sets forth the steps for PG&E, SDG&E, and SCE to administer the Green Tariff Option (Green Tariff) and Enhanced Community Renewables (ECR) components of the GTSR Program. |
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

| | Intervenor | CPUC Verified |
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| Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)): | | |
| 1. Date of Prehearing Conference (PHC): | 9/25/2013 | Verified. |
| 2. Other specified date for NOI: | 12/12/2013 | Verified. <i>See Ruling on Sustainable</i> |

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| | | Economies Law Center's Showing of Significant Financial Hardship (01/09/14). |
| 3. Date NOI filed: | 12/10/2013 | Verified. |
| 4. Was the NOI timely filed? | | Yes, Sustainable Economies Law Center (SELC) timely filed the notice of intent to claim intervenor compensation, as allowed by ALJ Clark's e-mail ruling (11/12/13). |
| Showing of customer or customer-related status (§ 1802(b)): | | |
| 5. Based on ALJ ruling issued in proceeding number: | A.12-01-008 | Verified. |
| 6. Date of ALJ ruling: | 1/9/2014 | Verified. |
| 7. Based on another CPUC determination (specify): | | |
| 8. Has the Intervenor demonstrated customer or customer-related status? | | Yes, SELC demonstrated appropriate status. |
| Showing of "significant financial hardship" (§ 1802(g)): | | |
| 9. Based on ALJ ruling issued in proceeding number: | A.12-01-008 | Verified. |
| 10. Date of ALJ ruling: | 1/9/2014 | Verified. |
| 11. Based on another CPUC determination (specify): | | |
| 12. Has the Intervenor demonstrated significant financial hardship? | | Yes, SELC demonstrated significant financial hardship. |
| Timely request for compensation (§ 1804(c)): | | |
| 13. Identify Final Decision: | D.15-01-051 | Verified. |
| 14. Date of issuance of Final Order or Decision: | 2/02/2015 | Verified. |
| 15. File date of compensation request: | 4/01/2015 | Verified. |
| 16. Was the request for compensation timely? | | Yes, SELC timely |

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| | filed the request for intervenor compensation. |
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C. Additional Comments on Part I (use line reference # as appropriate):

| # | Intervenor's Comment(s) | CPUC Discussion |
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| Line #5 & #9 | SELC's showing of financial hardship and customer status is contained in our NOI. (See <i>ALJ ruling on SELC's Showing of Financial Hardship, issued on January 9, 2014 in A.12-01-008 and A.12-04-020</i> ; see also Attachment 2 - ALJ Richard Clark's November 12, 2013 electronic ruling granting SELC's Motion Requesting Party Status and allowing 30 days from that date for SELC to file a Notice of Intent to Claim Intervenor Compensation.) | Verified. Attachment 2 is removed from this Decision and may be found with SELC's claim for intervenor compensation. |

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).

| Intervenor's Claimed Contribution(s) | Specific References to Intervenor's Claimed Contribution(s) | CPUC Discussion |
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| <p><u>ECR – Enhanced Community Renewables Program</u></p> <p>SELC submitted testimony, several rounds of comments, and briefs concerning the ECR program.</p> <p>As is often the case in a consolidated proceeding involving multiple utilities and a large number of intervenors, several intervenors provided similar policy recommendations to resolve the issues before the Commission. When advocating for ECR programs that comply with the Legislative Findings and Statements</p> | <p>“SELC supports the implementation of shared renewable energy projects with true community attributes including ownership, management, and/or control by community residents. Particularly, SELC emphasizes participation of diverse communities and low-income residential ratepayers in these community renewable energy projects.”</p> <p>Direct Testimony of Shiva Patel on behalf of the Sustainable Economies Law Center, Exhibit SELC-01, January 10, 2014.</p> <p>SELC noted that “many communities across the country have developed</p> | <p>Intervenor made substantial contributions to the resolution of ECR program issues.</p> |

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| <p>of Intent of SB 43, SELC provided a unique perspective that emphasized implementing ECR programs that procured capacity from community-based projects, which could be community-owned and/or community-controlled.</p> <p>SELC repeatedly recommended that utilities design ECR programs that provide customers with the option to contract directly with a developer to subscribe to a specific, local shared renewable energy facility owned or controlled by community members.</p> <p>SELC played a key role in ensuring that the ECR programs remain flexible enough to allow innovative arrangements between customers and developers and to incentivize community participation and involvement in the development of local, community renewable projects.</p> <p>D.15-01-051 adopted in part SELC's recommendations by noting that the ECR "program must encourage community participation" and "needs to give communities the flexibility to structure their projects in innovative ways that incentivize community participation and developer interest in new projects."</p> <p>SELC argued that PG&E's original ECR proposal, consisting of a partial settlement agreement, was vague and not in compliance with SB 43.</p> <p>SELC filed comments and two opening briefs that argued against parts of PG&E's revised proposal,</p> | <p>community-owned renewable energy projects in collaboration with their local utilities." SELC Comments at 3, March 7, 2014.</p> <p>SELC noted it supports "SDG&E's <i>Share the Sun</i> program, as long as it does not prohibit or impair opportunities for individual customers, who...subscribe to a specific shared renewable project, to own a portion of their selected project." SELC Opening Brief at 9-10, March 21, 2014.</p> <p>SELC emphasized that SDG&E's surveys and research... "indicated that customers' preferences were almost evenly split between a simple 'green tariff' versus a 'community solar type program.'" SELC Comments at 3, March 7, 2014, and SELC Opening Brief at 9, March 21, 2014.</p> <p>"Generally, community renewable projects are designed to allow customers to contract directly with a third-party participating renewable developer to subscribe to a specific local renewable facility. SELC envisions that the majority of the project would be owned or controlled by individual residents of the community and the majority of the project's economic benefits would be distributed locally." D.15-01-051, at 57-58, and footnote 132.</p> <p>"To be successful, the [ECR] program needs to give communities the flexibility to structure their projects in innovative ways that incentivize community participation and developer interest in new projects." D.15-01-051, at 59.</p> <p>"Because the purpose of ECR is to involve communities in the development of renewable projects, community</p> | |
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| <p>which proposed the use of a “local project portfolio” to support the ECR program and did not allow customers to contract directly with developers.</p> <p>SELC filings demonstrated that PG&E’s ECR program would not procure projects that are truly community-based and did not have a mechanism for prioritizing projects where customers have worked directly with a developer to bring a proposal to the utility.</p> <p>D.15-01-051 recognized SELC’s arguments by noting that PG&E’s proposal did not “provide an adequate role for local communities” and directing PG&E “to submit include [sic] details of their proposed ECR component that complies with this decision...”</p> <p>SELC supported PG&E’s proposed location criteria for ECR projects, which was adopted in part in D.15-01-051.</p> <p>D.15.01.051 adopted SELC’s recommendations that the decision’s Finding of Facts include the locational criteria of ECR projects in the definition of “community.”</p> <p>D.15.01.051 adopted SELC’s recommendation that the decision’s Finding of Facts and a Conclusion of Laws consistently articulate the criteria for assessing community interest in ECR projects.</p> <p>SELC recommended that utilities preferentially procure capacity from community-based projects to</p> | <p>involvement is an important element of the program...Similar to purchasing or leasing solar for a home, the customer and developer are likely to have an agreement separate from the utility in which both the customer and developer take on obligations to each other. Developer and customer are free to design their own transaction structure to maximize the goals of customers and developers, and to ensure that projects are financeable.” D.15-01-051, at 64.</p> <p>“Community involvement with a specific local facility will increase community interest and participation in the GTSR Program.” Finding of Fact 70, D.15-01-051, at 166.</p> <p>“Allowing flexible transactional relationships between ECR developers and customers will maximize incentives for creative ECR transaction structures that achieve the goals of both developers and customers.” Finding of Fact 73, D.15-01-051, at 167.</p> <p>“The ECR component should involve local communities.” Conclusion of Law 25, D.15-01-051, at 175.</p> <p>“The ECR component should allow maximum flexibility for customers and developers to enter into agreements regarding renewable generation projects. Conclusion of Law 27, D.15-01-051, at 175.</p> <p>SELC noted that “PG&E’s Opening Comments continued to propose the identical process outlined in the Proposed Settlement, for the ‘settling parties to work towards the development of a community-based renewable option that could incorporate some of the attributes of [SDG&E’s] <i>Share the Sun</i>’... PG&E’s Revised Testimony</p> | |
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| <p>increase developer and community member interest in the ECR program.</p> | <p>continues to be vague, indicating only that ‘PG&E has <i>started</i> meeting with the settling parties to <i>explore</i> different potential elements of the GTSR Program that <i>could</i> facilitate additional renewables located closer to load.’” SELC Reply Comments at 7, December 20, 2013.</p> <p>Regarding PG&E’s revised ECR proposal, SELC noted that “two features of PG&E’s proposal are obstacles to developers and community-based organizations that would like to implement Community-Based Renewable Energy Projects... The first obstacle to community-owned renewable energy projects is PG&E’s decision not to permit direct developer/customer agreements, and the second obstacle is PG&E’s decision to require that participating customers pay the price for a ‘local renewable portfolio,’ even though they have selected to subscribe to a specific project.” SELC Comments at 16, March 7, 2014.</p> <p>SELC emphasized that “without customer/developer agreements..., utility customers are less likely to want to financially support their local projects.” SELC Opening Brief at 12, March 21, 2014.</p> <p>“PG&E’s ECR proposal misses key elements necessary to be truly community-based and to promote development of the ECR market. First, PG&E’s proposal does not provide for a direct project-customer link. Instead, it would use a pool of locally based projects. Second, it does not contemplate allowing developers and customers to work together and create innovative structures for ECR projects.</p> | |
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| | <p>Third, it does not have a mechanism for prioritizing projects where customers have worked with a developer to bring a proposal to the utility. D.15-01-051, at 60.</p> <p>“Given that the ECR component’s essential elements include encouraging local support for specific ECR projects, PG&E’s proposal does not “provide an adequate role for local communities.” D.15-01-051, at 60.</p> <p>“This decision directs the IOUs, including PG&E, to submit include [sic] details of their proposed ECR component that complies with this decision above in the JPIAL and CSIAL.” D.15-01-051, at 60.</p> <p>SELC stated that it “supports PG&E’s proposed requirement that customers must be located within 10 miles of the ECR project or within the same city or county as the project location...” SELC Comments at 6, March 7, 2014.</p> <p>SELC made the following recommendation: “Findings of Fact [31] should include... characteristics necessary for a true community-based renewable energy project. SELC recommends.... the following modifications...: ‘For ECR projects, community is defined as customers located within the municipality or within ten miles of the municipality, <i>whereby customers are allowed to subscribe to and participate in the development of a specific shared renewable project located within or close to their community.</i>’” SELC Comments on PD at 2-3, January 16, 2015.</p> <p>“For ECR projects, community can be defined as customers with addresses</p> | |
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| | <p>located within ten miles of the facility or within the municipality or county where the facility is located (Local Community), whereby customers are allowed to subscribe to and participate in the development of a specific shared renewable project located within or close to their community.” Finding of Fact 31, D.15-01-051, at 163.</p> <p>SELC recommended modifications to “Finding of Fact 73 [now 71] and Conclusion of Law 27 [now 26] to consistently articulate the criteria for assessing community interest in ECR projects.” SELC Comments on PD at 5-6, January 16, 2015.</p> <p>“Community interest in ECR projects can be demonstrated by (i) documentation that community members have committed to enroll in 30% of the project’s capacity or documentation that community members have provided expressions of interest to reach a 50% subscription rate, and (ii) a minimum of three separate subscribers.” Finding of Fact 71, D.15-01-051, at 166.</p> <p>“A guarantee that community members located in the Local Community have committed to enroll in 30% of a project’s capacity, or have provided expressions of interest sufficient to reach a 50% subscription rate from a minimum of three different community customers, is sufficient to demonstrate community interest for purposes of an ECR project.” Conclusion of Law 26, D.15-01-051, at 175.</p> <p>SELC noted that PG&E’s procurement process for the ECR program lacked the “specificity and certainty needed to convince developers...to make long-</p> | |
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| | <p>term investments in renewable energy generation located closer to load.”</p> <p>SELC Comments at 8-9, March 7, 2014.</p> <p>“Providing assurance of bid acceptance will increase developer interest in ECR projects.” Finding of Fact 76, D.15-01-051, at 167.</p> | |
| <p><u>EJ - Environmental Justice</u></p> <p>SELC supported efforts to require that utilities set specific targets to meet their proportionate share of the Environmental Justice (EJ) reservation and propose plans for prioritizing EJ projects.</p> <p>D.015-01-051 set specific EJ procurement targets for each utility and directed the utilities to propose plans for prioritizing EJ projects.</p> <p>SELC provided comments regarding the screening methodology needed to identify EJ communities consistent with SB 43.</p> | <p>SELC argued that, similar to SDG&E, PG&E should “set clear numerical objectives for procurement of capacity from facilities located in impacted communities.” SELC Reply Comments at 18, December 20, 2013.</p> <p>“To meet its proportionate share of the EJ carve out, PG&E should provide incentives and clear signals to developers... interested in participating in the ECR program.” SELC Comments at 21, March 7, 2014.</p> <p>“It is reasonable to allocate procurement of EJ project capacity proportional to retail sales.” Finding of Fact 66, D.15-01-051, at 166.</p> <p>“Numerous parties point out that to make the EJ Reservation meaningful, it may be necessary to take additional, proactive steps to ensure that EJ Projects are more than just a reservation of capacity. Specific suggestions include: Allowing projects sized under 500 kW; Preferential treatment for EJ Projects in RAM and ReMAT.... [W]e direct the IOUs to be prepared to propose plans for prioritizing EJ Projects as part of Phase IV.” D.15-01-051, at 56.</p> <p>“SDG&E argues that rather than using either EJSM or CalEnviroScreen, it should be permitted to develop its own simplified method for identifying the</p> | <p>Intervenor made substantial contributions to the environmental justice issues.</p> |

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| | most impacted areas. However, as SELC points out, although SB 43 does not expressly mention CalEnviroScreen, the statute clearly calls for an existing methodology developed by CalEPA to be used. D.15-01-051, at 52. | |
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

| | Intervenor's Assertion | CPUC Discussion |
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| a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹ | Yes | Verified. |
| b. Were there other parties to the proceeding with positions similar to yours? | Yes | Verified. |
| c. If so, provide name of other parties: Clean Coalition, California Environmental Justice Alliance (CEJA), The Vote Solar Initiative (Vote Solar), Interstate Renewable Energy Council (IREC), Solar Energy Industries Association (SEIA), Shell Energy North America (Shell), City and County of San Francisco (CCSF). | | Yes. |
| d. Intervenor's claim of non-duplication: SELC's intervention focused on the ECR and EJ Reservation components of the GTSR program. There were other intervenors in this proceeding that provided comments concerning the ECR component of the GTSR program. However, several intervenors, such as Shell, represented the interests of large corporate third party developers, whereas SELC advocated for customer-owned ECR projects and community developers (i.e., cooperatives, not-for profits, municipalities). Similarly, other intervenors, such as the organizations mentioned below and CCSF, did not emphasize customer-owned and/or controlled projects either. Vote Solar, IREC, and SEIA (collectively, know as "Joint Renewable Parties") had a position similar to SELC's position regarding the ECR component of the GTSR program, namely that the utilities should allow customers to subscribe to a specific offsite renewable energy project with the characteristics the customers prefer. However, unlike the Joint | | Intervenors took reasonable steps to minimize unproductive duplication. |

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

Renewable Parties, SELC's recommendations emphasized the facilitation of customer-owned and customer-controlled ECR projects. In light of SELC's and the Joint Renewables Parties's overall similar interest, SELC staff hosted a meeting with Vote Solar (Susana Churchill) and IREC (Joe Weidman) on December 2, 2013, to discuss the parties' interests, avoid duplication of efforts, and coordinate advocacy on intervenor comments filed on December 20, 2013. As a result of this meeting, SELC worked hard not to duplicate Joint Renewable Parties' contributions. In addition, on January 22, 2014, SELC filed a motion which supported Joint Renewables Parties' motion to consolidate SCE's Application 14-01-007 with the instant proceeding in order to avoid duplication of efforts and minimize costs to participate in proceedings that raised the same factual and legal issues.

SELC worked very closely with Clean Coalition and CEJA to avoid undue duplication of effort while coordinating the effectiveness of each groups' advocacy to improve PG&E's proposed ECR program and to ensure effective implementation of the EJ Reservation. SELC's records (See Timesheets and Records) include several entries of conference calls that were devoted to communicating with Clean Coalition and CEJA about strategies for coordinating and consolidating our efforts on each issue area allocation. For example, after the ALJ directed PG&E to revise its ECR proposal, SELC worked with Clean Coalition and CEJA to prepare joint comments on PG&E's draft proposal (*See PG&E Exhibit 5, pp. 4 to 6.*) In addition, SELC worked with Clean Coalition to ask joint questions/discovery requests to PG&E regarding their revised ECR proposal.

As a result of SELC's collaboration with Clean Coalition and CEJA, SELC identified that its comments concerning the EJ reservation and EJ projects overlapped with CEJA's positions and recommendations. Consequently, we did not allocate time to include extensive comments in our briefs concerning the EJ reservation and EJ projects because CEJA's briefs covered most of SELC's position regarding those issues.

Lastly, rather than request separate ex parte meetings, SELC, Clean Coalition, and CEJA opted to jointly request and participate in ex parte meetings with Commissioners' advisors. The parties requested joint ex parte meetings with three separate Commission's offices. During these ex parte meetings, each party emphasized different points and issues, while materially supplementing each other's presentation. This approach was an efficient allocation of time to advocate for similar positions and complement each party's issues. (*See Ex parte Notices submitted on 5/27/2014 with filed dates 5/16/2014.*)

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| In conclusion, the Commission should find SELC’s participation was efficiently coordinated with other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenors. | |
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

| a. Intervenor’s claim of cost reasonableness: | CPUC Discussion |
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| <p>SELC’s participation in this proceeding was directed at policy and environmental matters, and therefore ascertaining direct benefits, in terms of actual dollars, to ratepayers is impossible.</p> <p>Nevertheless, SELC’s written submissions as an individual party, as well as through actions carried out with Clean Coalition and CEJA, helped significantly emphasize the importance of the ECR and EJ reservation components of the GTSR program, which resulted in the Commission requiring that the utilities submit in Phase IV of this proceeding more specific plans for implementing and optimizing their ECR and EJ program components.</p> <p>A well defined and cost-effective ECR program option will encourage more developers to propose projects that are closer to load, while at the same time encourage greater customer subscription in the GTSR program. As the Commission noted: “The rewards of ECR are community involvement, increased renewables, locational benefits, and certainty of renewable power cost.” D.15-01-051, at 166. “Community involvement with a specific local facility will increase community interest and participation in the GTSR Program.” Finding of Fact 70, D.15-01-051, at 166.</p> <p>Moreover, a program that includes proactive steps to ensure procurement of capacity from EJ projects will ensure that the EJ reservation is more than just a reservation and that it will actually result in developing small distributed generation facilities in the most impacted and disadvantaged communities as contemplated in SB 43.</p> <p>These outcomes will help achieve the objectives of SB 43, which are to build distributed generation facilities to create “jobs and reduce[] emissions of greenhouse gases,” support “enhanced community renewables programs to facilitate development of eligible renewable energy resource projects located close to the source of demand,” and build distributed generation “facilities that are no larger than 1 MW”</p> | <p>Intervenor’s participation was productive.</p> |

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| <p>located in the most impacted and disadvantaged communities.</p> <p>In addition, these outcomes are consistent with D.98-04-059, which stated:</p> <p>“With respect to environmental groups, we have concluded they were eligible in the past with the understanding that they represent customers whose environmental interests include the concern that, e.g., regulatory policies encourage the adoption of all cost-effective conservation measures and discourage unnecessary new generating resources that are expensive and environmentally damaging. (D.88-04-066, mimeo, at 3.) They represent customers who have a concern for the environment which distinguishes their interest from the interests represented by Commission staff, for example.” (D.98-04-059, at 30, footnote 14.)</p> <p>In conclusion, SELC represents customers with a concern for the environment, especially those interested in supporting ECR programs that spur local ownership and economic innovation that decreases dependence on fossil fuel and maximizes energy independence. These customers, and all California ratepayers within the investor-owned utilities’ service territories, have benefited from SELC’s participation in this proceeding because SELC’s advocacy has helped emphasize that ECR programs must actually spur local economic and environmental benefits.</p> | |
| <p>b. Reasonableness of hours claimed:</p> <p>SELC is a small not-for-profit organization with a tight budget and limited staff. Therefore, SELC does not have the resources to assign multiple staff to this proceeding or to delegate work internally from more senior to more junior staff.</p> <p>Linda Barrera was the lead attorney in this consolidated proceeding, and she also helped coordinate with SELC staff and other attorneys and advocates working for Clean Coalition and CEJA. Ms. Barrera has experience representing ratepayers in proceedings before the Commission and she brought that experience to bear in this proceeding. Caroline Lee, a recent law school graduate with a fellowship with SELC, assisted Mr. Barrera in this proceeding.</p> <p>Although Ms. Barrera is theoretically eligible to bill at a higher hourly rate (\$300), SELC is applying a reduction of her work hours (\$215). To make efficient use of time and resources, whenever possible, Ms. Barrera delegated to Caroline Lee tasks associated with communicating orally and electronically with other intervenors and participating in conference calls hosted by the utilities. In addition, SELC limited the attendance of its staff at the administrative hearings for this proceeding to avoid duplicating efforts. Furthermore, the record in the proceeding demonstrates that SELC</p> | <p>Intervenor’s hours expended in this proceeding are reasonable in terms of its work product. Intervenor’s requested hourly rates are reasonable.</p> |

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| <p>strived to narrow its participation to areas where it could more likely bring a unique perspective and contribution.</p> <p>In addition to the efficiency and costs savings noted above, SELC relied on pro bono assistance of multiple individuals. SELC's expert witness, Shiva Patel, prepared testimony on behalf of SELC and was available for cross-examination, all on a pro bono basis. Furthermore, SELC obtained technical assistance from staff that work at the Clean Energy Collective, LLC, and Energy Solidarity Cooperative, and used the research conducted by law student interns and other volunteers. Accordingly, SELC eliminated the need to seek compensation in these areas and in the ways described above.</p> | |
| <p>c. Allocation of hours by issue:</p> <p>Consistent with D.98-04-059 and D.85-08-012, SELC's hours were apportioned among the issues as presented in its Notice of Intent to Claim Intervenor Compensation and the Commission's characterization of the issues in D.15-01-051.</p> <p>SELC allocated its time entries in attachment D by the following codes:</p> <p>ECR - Enhanced Community Renewables Program: work to write comments and briefs and review testimony regarding ECR general program characteristics, PG&E's and SDG&E's ECR proposals, ECR location criteria and size, ECR customer interest criteria, and procurement preference for ECR. Time allocated on ECR: 80.28%</p> <p>EJ – Environmental Justice: work to write comments and briefs and review testimony regarding EJ reservation and EJ projects, including screening methodology and procurement process. Time allocated on EJ: 19.72%</p> | <p>Intervenor reasonably allocated the hours claimed.</p> |

B. Specific Claim:*

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| ATTORNEY, EXPERT, AND ADVOCATE FEES | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate \$ | Total \$ |
| Linda Barrera | 2013 | 18.55 | \$210 | New Rate Requests, see Attachment 4 | \$3,895.50 | 18.55 | \$210.00 | \$3,895.50 |

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| CLAIMED | 2014 | 44.65 | \$215 | New Rate Requests, see Attachment 4 | \$9,599.75 | 44.65 | \$215.00 | \$9,599.75 |
| Linda Barrera | 2015 | 5.75 | \$215 | New Rate Requests, see Attachment 4 | \$1,236.25 | 5.75 | \$215.00 | \$1,236.25 |
| Caroline Lee | 2013 | 11.14 | \$160 | New Rate Requests, see Attachment 4 | \$1,782.40 | 11.14 | \$160.00 | \$1,782.40 |
| Caroline Lee | 2014 | 41.35 | \$165 | New Rate Requests, see Attachment 4 | \$6,822.75 | 41.35 | \$165.00 | \$6,822.75 |
| Subtotal: \$ 23,336.65 | | | | | | Subtotal: \$ 23,336.65 | | |
| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
| Item | Year | Hours | Rate \$ | Basis for Rate* | Total \$ | Hours | Rate | Total \$ |
| Linda Barrera | 2015 | 12 | 107.5 | D.98-04-059, at 53 | \$1,290 | 12.00 | \$107.50 | \$1,290.00 |
| Subtotal: \$1,290 | | | | | | Subtotal: \$1,290.00 | | |
| TOTAL REQUEST: | | | | | \$24,626.65 | TOTAL AWARD: \$24,626.65 | | |
| <p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate.</p> | | | | | | | | |
| ATTORNEY INFORMATION | | | | | | | | |
| Attorney | | Date Admitted to CA BAR ² | | Member Number | | Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation | | |
| Linda Barrera | | 6/1/2009 | | 263104 | | No | | |
| Caroline Lee | | 12/6/2013 | | 293297 | | No | | |

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

PART IV: OPPOSITIONS AND COMMENTS

**Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))**

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| A. Opposition: Did any party oppose the Claim? | No. |
| B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))? | Yes. |

FINDINGS OF FACT

1. SELC has made a substantial contribution to D.15-01-057.
2. The requested hourly rates for SELC's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$24,626.65.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.
2. The comment period on today's decision should be waived, and the order should be made effective immediately, to facility to prompt payment of the award.

ORDER

1. Sustainable Economies Law Center is awarded \$24,626.65.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison Company shall pay Sustainable Economies Law Center their respective shares of the award, based on their California-jurisdictional electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 15, 2015, the 75th day after the filing of Sustainable Economies Law Center's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, 2015, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

| | | | |
|----------------------------------|--|---------------------------|----|
| Compensation Decision: | | Modifies Decision? | No |
| Contribution Decision(s): | D1501051 | | |
| Proceeding(s): | A1201008 | | |
| Author: | ALJ DeAngelis | | |
| Payer(s): | Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric | | |

Intervenor Information

| Intervenor | Claim Date | Amount Requested | Amount Awarded | Multiplier? | Reason Change/Disallowance |
|---|-------------------|-------------------------|-----------------------|--------------------|-----------------------------------|
| Sustainable Economies Law Center (SELC) | 04/01/2015 | \$24,626.65 | \$24,626.65 | No | N/A |

Advocate Information

| First Name | Last Name | Type | Intervenor | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|-------------------|------------------|-------------|-------------------|-----------------------------|----------------------------------|---------------------------|
| Linda | Barrera | Attorney | SELC | \$210.00 | 2013 | \$210.00 |
| Linda | Barrera | Attorney | SELC | \$215.00 | 2014 | \$215.00 |
| Linda | Barrera | Attorney | SELC | \$215.00 | 2015 | \$215.00 |
| Caroline | Lee | Attorney | SELC | \$160.00 | 2013 | \$160.00 |
| Caroline | Lee | Attorney | SELC | \$165.00 | 2014 | \$165.00 |

(END OF APPENDIX)